

AMENDMENTS TO THE DRAWINGS

The attached sheet(s) of drawings includes changes to FIG. 7 and FIG. 24 to correct erroneous reference numerals.

Attachment: Replacement sheets

REMARKS

In the Non-Final Office Action mailed on August 15, 2006 ("Office Action"), the Examiner rejected the claims as follows:

<u>Claims</u>	<u>35 U.S.C. §</u>	<u>Reference(s)</u>
1-26	112, second paragraph	
1, 2, 5, 7, 9 -12, 16, 19-23 and 26	103(a)	Haitjema, "Modeling Lake-Groundwater Interactions in GFLOW 2000", March 4, 2002 ("Haitjema") and Deal et al., "Ecological Sustainability and Urban Dynamics: A Disaggregated Modeling Approach to Sustainable Design", 7 th International Conference on Computers in Urban Planning and Urban Management, Honolulu, HI 2001 ("Deal")
3, 13, 14, 17, 24, 25 and 27-29	103(a)	Haitjema, Deal, and Muller, "Advanced Drawings Tools Aid Network Planning", International Journal of Network Management, Vol. 7, pages 324-333, 1997 ("Muller")
6 and 8	103(a)	Haitjema, Deal, and Liaw et al., "Low-Impact Development: An Innovative Alternative Approach to Stormwater Management", Journal of Marine Science and Technology, Vol. 8, No. 1, pp 41-49, 2000 ("Liaw")
4, 15 and 18	103(a)	Haitjema, Deal, and Gaillard et al., "Modelling of Human Dimension on Soil Erosion Processes for Remote Sensing Application", IEEE International Symposium on Geoscience and Remote Sensing, IGARSS '97, Vol. 1, pages 122-124, 1997 ("Gaillard")

The Examiner also objected to Figures 7 and 24 of the drawings, the specification, and claims 1, 3, 12, 16 and 26. Applicants herein amend claims 1, 3, 4, 12, 15, 16 and 26, and cancel claims 2 and 21. As a result, claims 1, 3-20 and 22-29 are pending. Further examination and review in view of the amendments and remarks below are respectfully requested.

Objection to the Drawings

The Examiner objected to FIG. 7 of the drawings for including a reference numeral "711" not mentioned in the description. Applicants herein amend FIG. 7 to no longer include reference numeral "711."

The Examiner objected to FIG. 24 of the drawings for including an erroneous reference numeral "2205." Applicants herein amend FIG. 24 to correct the erroneous substitution of reference numeral "2405" with reference numeral "2205."

Objection to the Specification

The Examiner objected to the specification for informalities. In particular, the Examiner indicated that page 8, line 7 of the specification refers to element "201" instead of element "205." Applicants herein amend paragraph [0044] of the specification to correct an inadvertent typographical error (specifically, erroneous substitution of "205" with "201").

Objection to the Claims

The Examiner objected to claims 1, 3, 12, 16 and 26 for various informalities. Applicants herein amend claims 1, 3, 12, 16 and 26 to address the Examiner's concerns.

Rejection under 35 U.S.C. § 112, second paragraph

The Examiner rejected claims 1, 3-20 and 22-29 under 35 U.S.C. § 112, second paragraph. In particular, the Examiner indicated that the claims include deficiencies which

make the claims indefinite. Applicants herein amend claims 1, 3, 4, 12, 15, 16 and 26 to further clarify the claimed subject matter, thus obviating this rejection.

Prior Art Rejections

The Examiner rejected all of the pending claims under 35 U.S.C. § 103(a) over Haitjema and one or more of Deal, Muller, Liaw, and Gaillard. Applicants respectfully traverse these rejections.

As amended, all of the claims recite areas of a land use for calculating the outflow of water for an area based on the inflow of water to the area and attributes of the area, and a graphical representation of flow of water dependencies of areas and sources of water. For example, independent claim 1 recites "each object for calculating an outflow of water for an area based on an inflow of water to the area and attributes of the area" and "a graphical representation of flow of water dependencies of the areas and the sources of water," independent claim 16 recites "a graphical representation of flow of water dependencies of areas and sources of water of the site" and "calculating the outflow of each area . . . based on the inflows and attributes of the area," and independent claim 26 recites "a graphical representation of flow of water dependencies of areas and sources of water of the site" and "performing a simulation of flow of water based on the attributes and dependencies of the areas and sources of water."

The Examiner acknowledges that "Haitjema does not expressly teach objects representing areas of land use for calculating the outflow of water for an area based on the inflow of water and attributes of the object being areas of land use." (Office Action , p. 8.) But, the Examiner indicates that "Deal et al teaches objects representing areas of land use for calculating the influence of the areas of land use on a watershed based on the inflow of water and attributes of the object (page 12 of 25, "Model drivers represent the dynamic interactions between the urban system and the surrounding landscape."; pages 15 and 16 of 25, "Application" and "Model Results")." (Id.)

Applicants respectfully disagree. As a first matter, Deal describes a Land-Use Evolution and impact Assessment Model (LEAM) for evaluating human development patterns. (Deal, p. 8 of 25.) According to Deal, the LEAM utilizes contextual submodels which are run simultaneously on each grid cell of raster-based GIS maps. (Id.) A grid cell of a raster-based GIS map is very different from Applicants' area of a land use or an object representing an area of a land use. Second, the Examiner has not pointed to anything in Deal that could possibly correspond to Applicants' graphical representation of flow of water dependencies of areas and sources of water. As noted by the Examiner, Haitjema does not expressly teach areas of land use and, accordingly, Haitjema cannot teach or suggest a graphical representation of flow of water dependencies of areas and sources of water. Regarding Deal, Applicants can find nothing in Deal that even remotely suggests a graphical representation of flow of water dependencies of areas and sources of water, as recited. Third, although Deal discloses an example watershed model (Id., pp. 16-19 of 25), Deal neither teaches nor suggests calculating the outflow of water for the cells of the raster-based GIS map in its watershed model. In particular, Deal contains no teaching or suggestion of calculating the outflow of water for an area based on the inflow of water to the area and attributes of the area, as recited.

Although the Examiner has not provided anything in the prior art that teaches or suggests a graphical representation of flow of water dependencies of areas and sources of water, and calculating the outflow of water for an area based on the inflow of water to the area and attributes of the area, Applicants herein amend the claims to make it particularly clear that the area of land use is a type of pervious area or a type of impervious area. (See e.g., Specification, [0036, [0047].) In particular, Applicants herein amend independent claims 1, 16, and 26 to recite "each area being a type of pervious area or a type of impervious area." Because neither Haitjema, Deal, Muller, Liaw, nor Gaillard teaches or suggests the claimed "each area being a type of pervious area or a type of impervious area," the Examiner cannot establish that the claims are obvious. Moreover,

the claims recite a novel combination of elements that is neither taught nor suggested by Haitjema, Deal, Muller, Liaw, and Gaillard.


Conclusion

In view of the foregoing, Applicants respectfully submit that claims 1, 3-20 and 22-29 are allowable and ask that this application be passed to allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8000.

Applicants believe no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 50-0665, under Order No. 166538007US from which the undersigned is authorized to draw.

Dated: _____

Respectfully submitted,

By 
Do Te Kim

Registration No.: 46,231
PERKINS COIE LLP
P.O. Box 1247
Seattle, Washington 98111-1247
(206) 359-8000
(206) 359-7198 (Fax)
Attorney for Applicant

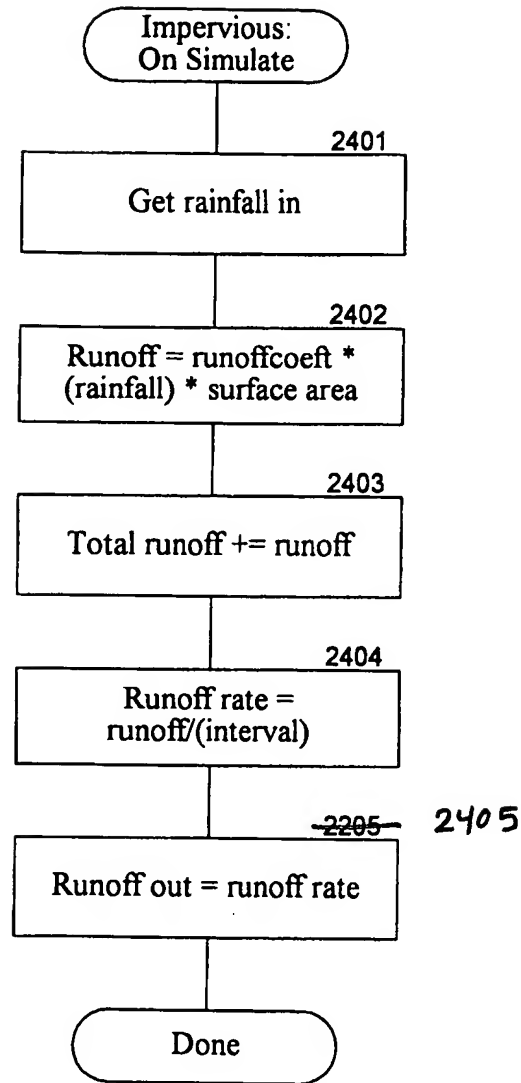


FIG. 24

NEW DEVELOPMENT

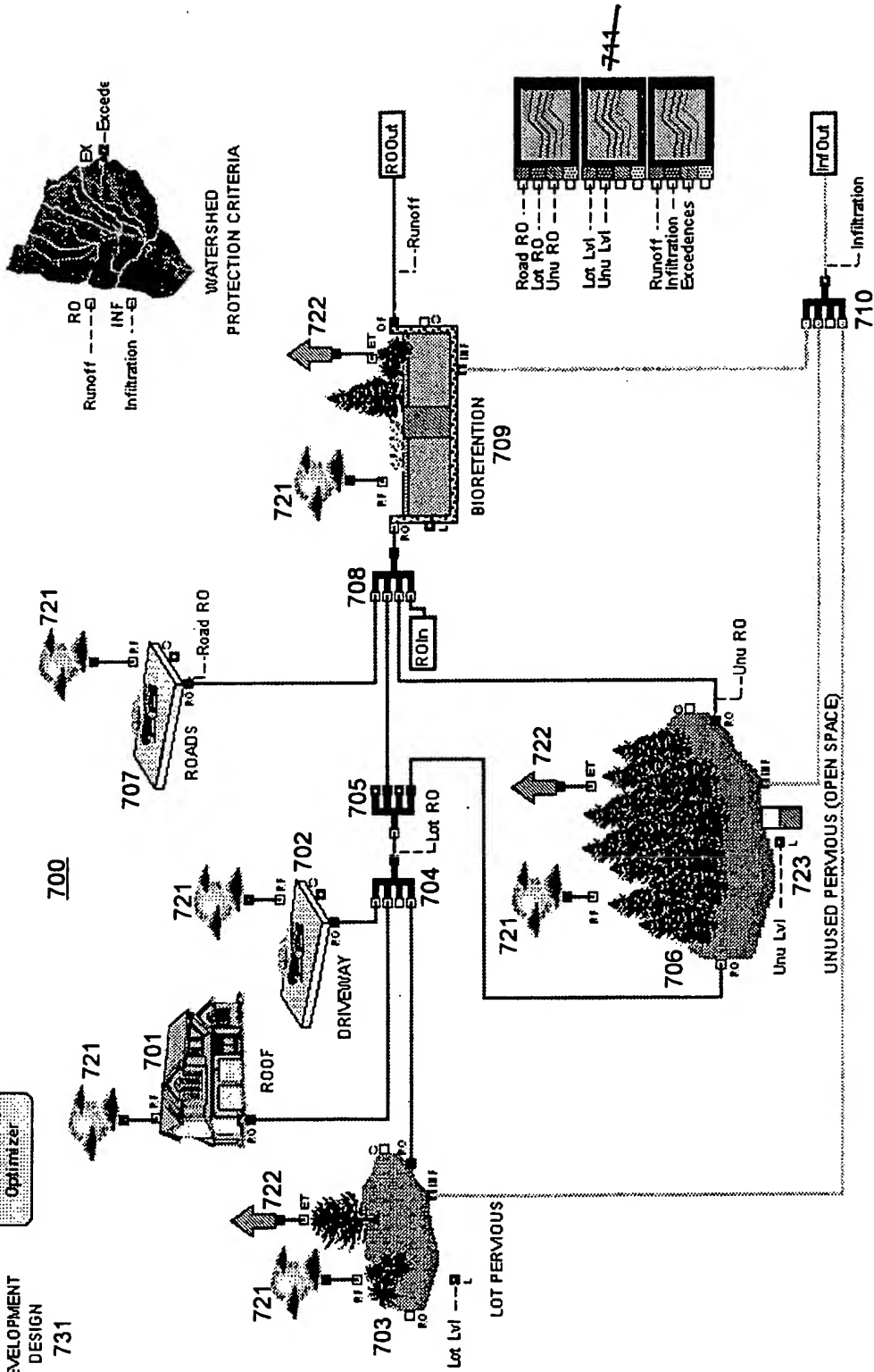


FIG. 7